



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Amendment of Part 97 of the Commission's Rules ) WP Docket No. 10-72  
Regarding Amateur Radio Service Communications )  
During Government Disaster Drills )

May 24, 2010

To: The Commission

**COMMENTS**

In response to the Public Notice in the captioned proceeding, the California Emergency Management Agency (Cal EMA) hereby submits comments in support of the proposed amendment of Part 97 of the Commission's amateur radio service rules with respect to amateur radio operations during government-sponsored emergency preparedness and disaster readiness drills and tests.

The current interpretation of 47 C.F.R. section 97.113(a)(3) limits participation of individually licensed amateurs in emergency preparations and hinders our ability to prepare for disasters. California faces many threats that could render primary communication methods inoperable. Amateur radio has proved critical in other disasters because amateur operations can reach a wide variety of people, even when other communications systems are impaired. Utilizing the amateur service increases our interoperability and continuity of operations because it transcends jurisdictions.

To ensure the successful transmission of information in emergencies, it is crucial that amateur radio operators be permitted to participate in disaster preparedness drills. Thus, Cal EMA agrees with the conclusion that employee status should not preclude or prevent participation in government-sponsored emergency and disaster tests and drills. Cal EMA also agrees that extending authority to operate amateur stations during such drills will enhance emergency preparedness and serve the public interest.

Sincerely,

Matthew R. Bettenhausen  
Secretary